



International Bureau

Federal Communications Commission
Washington, DC 20554

October 1, 2004

Jeffrey Olson, Esquire
Paul, Weiss, Rifkind, Wharton & Garrison LLP
1615 L Street, NW
Washington, DC 20036

Re: Orbital Debris Mitigation: SkyBridge II LLC, Application for Authority to Launch and operate the SkyBridge II Satellite System – File Nos. SAT-LOA-19971222-00221; SAT-AMD-20031104-00323.

Dear Mr. Olson:

This letter requests additional information, pursuant to Section 25.111(a) of the Commission's Rules, regarding the orbital debris mitigation plan of the SkyBridge II satellite system. On July 19, 2004, SkyBridge II notified the Commission that it intends to employ a storage orbit for disposal of its proposed non-geostationary satellite orbit Ka-band satellites.¹ SkyBridge II, however, did not provide specific information with respect to the particular storage orbit. Therefore, in order for the Commission to review the adequacy of the SkyBridge II plan for storage orbit disposal, we request the following information:

- 1) A statement disclosing the anticipated initial altitudes (apogee and perigee) and orbital parameters of the storage orbit and an analysis of the stability of the storage orbit (e.g. a plot of apogee and perigee altitude of the storage orbit verses time, over a period of more than 100 years);
- 2) An analysis, including all assumptions, of the amount of fuel, in kilograms, that would be required to accomplish the post-mission disposal and the amount of fuel SkyBridge II intends to reserve for this purpose;
- 3) An analysis, including all assumptions, of fuel gauging uncertainty and a statement of whether SkyBridge II has compensated for such uncertainty.

In addition, SkyBridge II has provided the Commission with information concerning a number of measures that it will employ in order to mitigate orbital debris, however, SkyBridge II did not specifically address the issue of potential collisions with large objects.² Therefore, we request that SkyBridge II provide the following information:

- 1) A statement as to whether SkyBridge II has assessed and limited the probability of its satellites becoming a source of debris by collision with large debris or other functioning satellites;

¹ Letter to Marlene H. Dortch, Secretary, FCC, from Jeffrey H. Olson, Attorney for SkyBridge II LLC (July 19, 2004).

² Amendment to application, SAT-AMD-20031104-00323, Exhibit C to Form 312, "Orbital Debris Mitigation."

2) Please indicate whether there are any other NGSO constellations, currently in orbit or planned, with similar orbital characteristics (i.e. apogee, perigee, inclination, or RAAN) such that the volumes in which the satellites will orbit substantially overlap. If there are, please provide an analysis of the potential risk of in-orbit collision and a description of any measures SkyBridge II plans to take to avoid such collision;

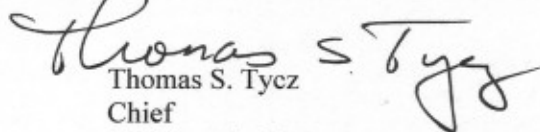
3) Please specify the tolerance, during the operational life of the satellite, to which the following orbital parameters will be maintained:

- a. Apogee
- b. Perigee
- c. Inclination
- d. RAAN
- e. Satellite phasing, for orbits with more than one satellite.

We also note that the SkyBridge II amendment states that "SkyBridge II will ... maintain stationkeeping to within 0.1° ".³ It is unclear as to what parameter this statement refers. We request that SkyBridge II clarify this statement concerning its orbital configuration.

In order for us to continue processing the SkyBridge II space station application, we require that the above information be provided by October 15, 2004. If you have any questions you may either contact Sankar Persaud at (202) 418-2441 or by e-mail at Sankar.Persaud@fcc.gov or Karl Kensinger at (202) 418-2441 or by e-mail at Karl.Kensinger@fcc.gov.

Sincerely,



Thomas S. Tycz
Chief
Satellite Division

³ Amendment to application, SAT-AMD-20031104-00323, Exhibit C to Form 312, "Orbital Debris Mitigation," page 2.